



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JFK Federal Building, Boston, MA 02203-2211

MEMORANDUM

DATE: December 10, 1990

SUBJ: Draft Site Inspection Report
James River Mill No. 8
Fitchburg, MA
TDD# F1-9002-12 MAD065777344

Superfund Records Center
SITE: James River Mill 8
REF: 1,3
OTHER: 556533

FROM: Nancy Smith *NS*
MA Site Assessment Coordinator

THRU: Donald Smith *DS*
FIT RPO

TO: John Weiss
Site Inspection Group Leader

I have received and reviewed the draft SI report for James River Mill No. 8, in Fitchburg, MA. I have the following comments on this report:

Table 1 mentions features which are not located on Figure 2. All pertinent site features should be identified on the site sketch. Possibly, another sketch of different scale will be needed to show the location of the surface impoundments in relation to the other site features.

Page 2, 1st paragraph after Table 1, why did the company refuse to allow NUS to sample the surface impoundment area? What part of the James River Mill No. 8 property is being impacted by the leachate from the Fitchburg WWTP lagoons? Was that area sampled by NUS? Is the "excavation area" the buried drum area which has since been excavated? That doesn't really make sense according to the source locations described in Table 1. The drum area is west of the site, the WWTP appears to be located south of the site, and leachate is flowing southwest, away from the site.

Table 2 should be modified to state that 1,327 drums of the hazardous wastes were disposed of in the two trenches. Also, leave a blank line between the Substance descriptions for the first and second listings to clarify that the second listing is only for paper sludge. The word "impoundments" is misplaced.

On page 3, the 1st paragraph states that paper sludge was disposed of in the surface impoundments between 1980 and 1984. The next paragraph states that paper sludge was sent to the City of Fitchburg WWTP. Please clarify this apparent contradiction. Was sludge only sent to the WWTP after 1984?

Were any hazardous wastes included in the sludge? If so, might this disposal practice constitute RCRA hazardous waste disposal from 1980-1984?

Pages 4-5, If there are no municipal drinking water supplies drawing water from within 4 miles of the site, or 15 miles downstream of the site, then please state this fact.